

EXHIBIT C



October 14, 2015

By Electronic Mail

Michael Gottfried
Duane Morris LLP
100 High Street, Suite 2400
Boston, MA 02110-1724

Norton Rose Fulbright US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701-4255
United States

Adam T. Schramek
Partner
Direct line +1 512 536 5232
adam.schramek@nortonrosefulbright.com

Tel +1 512 474 5201
Fax +1 512 536 4598
nortonrosefulbright.com

**Re: New England Compounding Pharmacy, Inc. Products Liability Litigation
Saint Thomas Entities' Discovery Requests**

Dear Mr. Gottfried:

I write on behalf of Saint Thomas Network, Saint Thomas Health and Saint Thomas West Hospital, formerly known as St. Thomas Hospital.

In Court today, counsel for MSM suggested that NECC's post-confirmation officer (hereafter "NECC") possesses the sales training materials we have sought from MSM and its principals, including audio and video recordings. Contrary to the suggestion made by MSM in court and in its briefing, we have scoured the repository for such materials to no avail. In particular, there are no audio or video recordings on the repository.

However, if NECC in fact possesses these materials, then it would provide the practical solution to the situation that Judge Boal was looking for at today's hearing. Accordingly, if NECC in fact possesses the following sales materials identified in the government's criminal discovery letters, please let us know and upload them to the repository:

- Twenty-six discs containing audio and video recordings of NECC sales trainings labeled "NECC Sales Audio and Video";
- White binder labeled, in part, "NECC Sales & Product Training March 7-11, 2005" (Control # 56);
- Compact discs labeled, in part, "Barry Cadden Sales Education" (Control # 56);
- Compact disks labeled, in part, "Barry Cadden Sales Education" (Control # 28);
- Compact Discs labeled, in part, "Barry Cadden Sales Education" (Control # 41);
- Pages of instructions on confirming orders (Control # 27);
- White binder labeled, in part, "New England Compounding Center Pharmacy and Product Training Guide" (Control # 6);

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- Packet labeled, in part, "Do you have questions about specific risk levels for any of your hospital's compounded preparations?" (Control # 43);
 - Promotional book labeled, in part, "NECC Hospital" (Control # 15);
 - White binders labeled, in part, "Training Binder" (Control # 33);
 - White binders labeled, in part, "Hospital Team Training Binder" (Control # 33);
 - White binder labeled, in part, "necc Surgery Center Training Binder" (Control # 8);
 - White binder labeled, in part, "necc Surgery Center Training Binder" (Control # 7);
- and
- White binders labeled, in part, "Surgery Center Training Binder" (Control #33).

In addition, we note that the index of materials preserved by NECC lists several training binders at NECC_MDL000032425-26 and NECC_MDL000032470-72. It is unclear if these are the same materials referenced in the government's discovery. Regardless, these materials were never uploaded to the repository and are highly relevant to the MDL proceedings. Accordingly, please upload these documents as soon as possible. We do not see any reference to training video or audio recordings, but if you do possess any such recordings, please produce those as well.

While I hope we can work this out informally, to the extent necessary, please treat this as a formal request pursuant to the federal rules. Let me know if you would like to discuss.

Very truly yours,



Adam T. Schramek

cc (via electronic mail):

Dan Rabinovitz
Yvonne Puig
Eric Hoffman
Chris Tardio
Matt Cline